

Pro Se 2 (Rev. 12/16) Complaint and Request for Injunction

UNITED STATES DISTRICT COURT

for the southernDistrict of Texas

Division

Case No. _____

(to be filled in by the Clerk's Office)

Miguel Angel Valadez

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

Drug Enforcement Agency (DEA) see attach.

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

COMPLAINT AND REQUEST FOR INJUNCTION

I. The Parties to This Complaint

A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name

Miguel Angel Valadez

Street Address

1715 Lexington Circle #5

City and County

Edinburg - Hidalgo

State and Zip Code

Texas - 78539

Telephone Number

956-777-9044

E-mail Address

chilipepper1709@yahoo.com

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Defendant No. 2

Name
 Job or Title (if known)
 Street Address
 City and County
 State and Zip Code
 Telephone Number
 E-mail Address (if known)

Hidalgo County District Attorney's office
 Ricardo Rodriguez - District Attorney
 100 S. Closner
 Edinburg - Hidalgo
 Texas - 78539
 956-292-7600
 unknown

Defendant No. 3

Name
 Job or Title (if known)
 Street Address
 City and County
 State and Zip Code
 Telephone Number
 E-mail Address (if known)

Hidalgo County Sheriff's office & Narcotics Division
 Narcotics - Sheriff & Lt.
 711 Cibola Rd
 Edinburg - Hidalgo
 Texas - 78541
 956-383-8114 / 956-213-7700
 unknown

Defendant No. 4

Name
 Job or Title (if known)
 Street Address
 City and County
 State and Zip Code
 Telephone Number
 E-mail Address (if known)

Drug Enforcement Agency (DEA) & (SOD)
 Supervisor for DEA & Supervisor for SOD & Narcotics
 1200 N. Commerce
 McAllen - Hidalgo
 Texas - 78501
 956-992-8400
 unknown

Defendant No. 5

Name
 Job or Title (if known)
 Street Address
 City and County
 State and Zip Code
 Telephone Number
 E-mail Address (if known)

City of Edinburg police & Narcotics Division
 Chief Police, Asst. Chief Police - Lt. - see police report
 1702 S. Closner Blvd
 Edinburg, Hidalgo
 Texas - 78539
 956-289-7700
 unknown

Defendant No. 6 - see attach.

Name:

Defendant #6: McAllen Police Department; Narcotics Division

Job or Title: Chief Police - Supervisor of Narcotics Division

street Address: 1601 ~~Chief~~^{M.V.} N. Bicentennial Blvd

city & County: McAllen; Hidalgo

state & Zipcode: 78501 - Texas

Telephone #: 956-681-2401

E-mail Address: unknown

Defendant #7: Name: Mission Police Dept.; Narcotics Division

Job or Title: Supervisor Narcotics Division; Chief of Police

city & County: Mission - Hidalgo

state & Zipcode: Texas - 78572

street Address: 1200 E 8th St. - Mission

Telephone #: 956-584-5000

Defendant #8; Name: Pharr Police Dept.; Narcotics Division

Job/Title: Supervisor Narcotics; Chief of Police

city & County: Pharr - Hidalgo

State & Zipcode: Texas - 78577

Telephone # - 956-402-4700

^{M.V.}
~~street~~ address: 1400 S. Cage Blvd

II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? *(check all that apply)*

☐ Federal question

☐ Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

B. If the Basis for Jurisdiction Is Diversity of Citizenship**1. The Plaintiff(s)****a. If the plaintiff is an individual**

The plaintiff, *(name)* N/A, is a citizen of the
State of *(name)* N/A.

b. If the plaintiff is a corporation

The plaintiff, *(name)* N/A, is incorporated
under the laws of the State of *(name)* N/A,
and has its principal place of business in the State of *(name)*
N/A.

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

2. The Defendant(s)**a. If the defendant is an individual**

The defendant, *(name)* N/A, is a citizen of
the State of *(name)* N/A. Or is a citizen of
(foreign nation) N/A.

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b. If the defendant is a corporation

The defendant, (name) N/A, is incorporated under the laws of the State of (name) N/A, and has its principal place of business in the State of (name) N/A.
 Or is incorporated under the laws of (foreign nation) N/A, and has its principal place of business in (name) N/A.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because (explain):

N/A

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the injunction or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

A. Where did the events giving rise to your claim(s) occur?

- 1.) 2005 Joy St. #2 - Edinburg, TX. 78539
- 2.) 3601 Bridget St. - Edinburg, TX. 78539
- 3.) 1715 Lexington Circle #5 - Edinburg, TX. 78539

* - see attach.

B. What date and approximate time did the events giving rise to your claim(s) occur?

Aug. 15, 2017 and to - present time
 24 hours - 7 days a week - no exaggeration

* see attach.

- C. What are the facts underlying your claim(s)? (For example: What happened to you? Who did what? Was anyone else involved? Who else saw what happened?)

1.) I used drugs for short period of time - causing undercover cops to surveillance me. since 8-75-17. -

I was physically, mentally - physiological - Torture. - see attach pics. since 8-15-2017 ongoing - No stopping - Torture only gets worse.

I claim the Hidalgo County DA Office, Edinburg Police Dept. Hidalgo County Sheriff's office, McAllen PD, Mission

The DEA driving force to recruit all Narcotic teams in the area and possible DEA from other areas in state took turns torturing me.

IV. Irreparable Injury

Explain why monetary damages at a later time would not adequately compensate you for the injuries you sustained, are sustaining, or will sustain as a result of the events described above, or why such compensation could not be measured.

Due to the extreme torture I have been subjected to, has left me with permanent damage to my skin, my heart, my head, my Ears my eyes, my physiological & emotional. This torture continues, last night my head area was constantly shocking me. itching so bad. The DEA or SD or any other Narcotic team do not know the critical danger of my health - They are causing. If my CK levels continue to increase, due to shocks & burns, I will have a heart attack or stroke. and kidney failure. My Life is in Danger Today and everyday they continue to torture.

★ see Attach.
This is NO heat or pain
This is life and death situation for me.

V. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

I want the torture to ceased immediately - before I am murdered in hands of Law Enforcement. They have violated every Civil Rights Violation there is. The torture continues non-stop 24/7. Actual Damages: Permanent Heart tissue Damage - Rhabdomyolysis - & Kidney failure, why do I claim I am Entitled: Life long Conditions that won't go away, piece of ear gone, chances for heart attack everyday, Life Long Headaches & Ear aches, no sports, or running Damaged relationship w/ spouse & daughter. I will have Life Long Hospital & medical Bills. - Amounts Requested: DEA = \$ 800,000.00 / 500! \$ 800,000.00 / Edinburg PD = \$ 250,000.00 / McAllen PD = \$ 100,000.00 Hidalgo County DA = \$ 800,000.00 / Sheriff's office = \$ 800,000.00 / Mission PD = \$ 100,000.00

VI. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 01-28-2019

Signature of Plaintiff

Printed Name of Plaintiff

Miguel Angel Valdez
Miguel Angel Valdez

B. For Attorneys

Date of signing: _____

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Street Address

State and Zip Code

Telephone Number

E-mail Address